



Louisville Metro Air Pollution Control District  
701 West Ormsby Avenue, Suite 303  
Louisville, Kentucky 40203-3137



22 May 2018

## Federally Enforceable District Origin Operating Permit Statement of Basis

**Source:** AarhusKarlsham (AAK) K1- Louisville Plant  
2520 South 7<sup>th</sup> Street  
Louisville, KY 40208

**Owner:** AarhusKarlsham (AAK) KI,- LLC  
2520 South 7<sup>th</sup> Street  
Louisville, KY 40208

Application Documents: See Table 8 in section I

Public Comment Date: 06 April 2018

Permitting Engineer: Jenny Rhodes      Permit Number: O-0291-16-F(R1)

Plant ID: 0291      SIC: 2079      NAICS: 311225

### Introduction:

This permit will be issued pursuant to District Regulation 2.17- *Federally Enforceable District Origin Operating Permits*. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

This permit action incorporates construction permit C-0291-1000 into the FEDOOP permit.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), 1 hr and 8 hr ozone (O<sub>3</sub>), particulate matter less than 10 microns (PM<sub>10</sub>); and unclassifiable for the 2012 standard for particulate matter less than 2.5 microns (PM<sub>2.5</sub>) and partial non-attainment area for sulfur dioxide (SO<sub>2</sub>).

### Permit Application Type:

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Initial issuance | <input type="checkbox"/> Permit Revision        | <input type="checkbox"/> Permit renewal |
|   | <input type="checkbox"/> Administrative         |   |
|   | <input type="checkbox"/> Minor                  |   |
|   | <input checked="" type="checkbox"/> Significant |   |

### Compliance Summary

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Compliance certification signed | <input type="checkbox"/> Compliance schedule included                 |
| <input type="checkbox"/> Source is out of compliance                | <input checked="" type="checkbox"/> Source is operating in compliance |

**I. Source Information**

1. **Product Description:** AAK is a vegetable oil processing facility.
2. **Process Description:** This facility bleaches, hydrogenates, deodorizes, and refines soybean oil.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent to this facility.
4. **Emission Unit Summary:**

Emission Unit	Equipment Description
U1	Bleaching, Hydrogenation, Deodorizing, and Refining Process
U2	Indirect Heat Exchangers
UIA	Insignificant Activities

5. **Fugitive Sources:** The fugitive sources are uncontrolled hexane emissions from portions of the bleaching, hydrogenation, deodorizing, and refining process.
6. **Permit Revisions:**

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	0124-01-F	11/5/2001	5/18/2001	Initial	Entire Permit	Initial Permit Issuance
NA	O-0291-16-F	5/18/2016	4/14/2016	Renewal	Entire Permit	Permit Renewal
R1	O-0291-16-F(R1)	5/22/2018	4/06/2018	Signif.	Entire Permit	Significant Revision to incorporate Construction Permit C-0291-1000 into the FEDOOP permit and update the standard language.

**7. Construction Permit History:**

Permit No.	Effective Date	Description
319-87	6/30/1988	One bleaching process for vegetable oil
320-87	6/30/1988	One (1) deodorizing process for vegetable oil
49-88	6/30/1988	One (1) refining process for vegetable oil
50-88	6/30/1988	One (1) acidulation process for vegetable oil
119-88	8/1/1988	One (1) Hydro-Chan Processing, Inc. model H-49 steam reforming hydrogen producing plant
166-90	6/6/1990	One (1) Nebraska Boiler Company Inc. model 2D1807
338-94-C	6/17/1994	One (1) Babcock & Wilcox water tube steam boiler, model # FM10-61, Coen Combustion model DA with low NOx burner, with a capacity of 40,000 pound of steam per hour.
83-00-C	4/30/2000	One (1) Babcock & Wilcox water tube steam boiler, model # FM10-52, with low NOx burner; with a capacity of 35,000 pound per hour of steam (43 MMBtu/hr).
C-0291-1000 -18-F	3/16/2018	One (1) new Deodorizing unit, rated capacity 400 tons/day replacing one of the existing units (276 tons/day each).

**8. Permit Renewal-Related Documents**

Document Number	Date Received	Description
11442	08/28/2006	FEDOOP Application
70025	03/11/2015	STAR Exempt Application
74913	01/21/2017	Certificate of Authority
89172	11/20/2017	Construction application for an upgrade to the Deodorizing process.

**9. Emission Summary:**

Pollutant	District Calculated Actual Emissions (ton/yr) 2014 Data	Pollutant that triggered Major Source Status (based on PTE)
CO	15.84	No
NO <sub>x</sub>	13.68	No
SO <sub>2</sub>	0.11	No
PM <sub>10</sub>	0.49	No
VOC	4.55	No

Pollutant	District Calculated Actual Emissions (ton/yr) 2014 Data	Pollutant that triggered Major Source Status (based on PTE)
Total HAPs	2.5	No
Single HAP	2.48	Yes

**10. Applicable Requirements**

- ☒ 40 CFR 60                      ☒ SIP                      ☐ 40 CFR 63  
☐ 40 CFR 61                      ☒ District Origin                      ☐ Other

**11. Referenced MACT Federal Regulations:** The source has no MACT requirements.

**12. Referenced non-MACT Federal Regulations:**

40 CFR 60 Subpart Dc                      Standards of Performance for Small Industrial-  
Commercial-Institutional Steam Generating Units

**13. Federal Regulations Not Applicable:** 40 CFR 63 Subpart JJJJJ, *National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, is not applicable by definition to gas fired boilers. §63.11195 lists boilers not subject to the subpart and §63.11195(e) states “A gas-fired boiler as defined in this subpart.” §63.11237 defines a gas-fired boiler as “Gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.”

**II. Regulatory Analysis**

- 1. Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. AAK does not manufacture, sell, or distribute any of the listed chemicals. The source’s use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.
- 2. Prevention of Accidental Releases 112(r):** AAK does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount.

### 3. Basis of Regulation Applicability

#### a. Plantwide

AAK is a potential major source for the Single HAP Hexane. Regulation 2.17 – *Federally Enforceable District Origin Operating Permits* establishes requirements to limit the plant wide potential emission rates to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements. The source requested limits of the criteria pollutant CO < 25 ton/yr, SO<sub>2</sub> < 25 ton/yr, and total HAPs < 12.5 ton/yr and largest single HAP < 5.0 ton/yr, to be a FEDOOP exempt from STAR as defined by Regulation 5.00, section 1.13.5.

Regulations 5.00 5.20, 5.21, and 5.23 (STAR Program) establishes requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards.

Regulation 2.17, section 5.2, requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the district upon request.

Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued to submit an Annual Compliance Certification by April 15, of the following calendar year. In addition, as required by Regulation 2.17, section 5.2, the source shall submit an Annual Compliance Report to show compliance with the permit, by March 1 of the following calendar year. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.17, section 3.5.

b. **Emission Unit U1** – Bleaching, Hydrogenation, Deodorizing, and Refining Processes

i. **Equipment:**

Emission Point	Description	Install Date	Applicable Regulations	Basis for Applicability
Bleaching Process				
E1a	Five (5) pressure leaf filter presses.	1988	7.25	Regulation 7.25 establishes requirements for equipment with the potential to emit VOCs greater than 5 tpy not regulated elsewhere in Regulation 7.
E1b		1988		
E1c		1988		
E1d		1988		
E1e		1988		
E4a	Two (2) condensate receiver tanks, 1000 gallons each	1988	7.25	
E4b		1988		
E5	Earth Slurry/Pre-coat tank, 6,000 lbs	1988	7.25	
E6	Mixer tank, 100 gallons	1988	7.25	
E7	N. Oil bleacher tank 103,350 lbs	1988	7.25	
E8	S. Oil bleacher tank 103,550 lbs	1988	7.25	
E9	#36 Surge tank 129,200 lbs	1988	7.25	
E10	Steam out tank 25,000 lbs	1988	7.25	
E11	Unused tank 1,400 gallons	1988	7.25	
E12	Unused tank 275 gallons	1988	7.25	
E13	#B7 Bleached oil storage tank 343,000 lbs	1988	7.12	Regulation 7.12 applies to each storage vessel constructed after April 19, 1972, having a storage capacity greater than 250 gallons and storing a true vapor pressure of VOC greater than 1.5 psia.

Emission Point	Description	Install Date	Applicable Regulations	Basis for Applicability
E14	#B9 Bleached oil blend tank 342,000 lbs	1988	7.25	Regulation 7.25 establishes requirements for equipment with the potential to emit VOCs greater than 5 tpy not regulated elsewhere in Regulation 7.
E15	#B11 Bleached oil tank 2,300,000 lbs	1988	7.25	
E16	#B12 Bleached oil tank 305,600 lbs	1988	7.25	
E17	#B13 Bleached oil tank 398,160 lbs	1988	7.25	
E18	#B14 Bleached oil tank 398,160 lbs	1988	7.25	
E19	E. BW Bleached oil tank 374,000 lbs	1988	7.25	
E20	W. BW Bleached oil tank 374,000 lbs	1988	7.25	
Hydrogenation Process				
E21a	Two (2) filter presses	1988	7.25	Regulation 7.25 establishes requirements for equipment with the potential to emit VOCs greater than 5 tpy not regulated elsewhere in Regulation 7.
E21b		1988	7.25	
E23	Four (4) hydrogen converters	1988	7.25	
E24	#F1 Bleach tank 100,000 lbs	1988	7.25	
E25	#F2 Bleach tank 105,000 lbs	1988	7.25	
E26	#F3 Bleach tank 50,000 lbs	1988	7.25	
E27	#1 Oil tank 425,000 lbs	1988	7.25	
E28	#2 Oil tank 429,000 lbs	1988	7.25	
E29	#3 Oil tank 334,000 lbs	1988	7.25	
E30	#4 Oil tank 338,000 lbs	1988	7.25	
E31	#5 Oil tank 342,000 lbs	1988	7.25	
E32	#6 Oil tank 342,000 lbs	1988	7.25	

Emission Point	Description	Install Date	Applicable Regulations	Basis for Applicability
E33	#8 Storage Tank, 342,000 lbs	1988	7.12	Regulation 7.12 applies to each storage vessel constructed after April 19, 1972, having a storage capacity greater than 250 gallons and storing a true vapor pressure of VOC greater than 1.5 psia.
E34	#40 Blend tank 84,500 lbs	1988	7.25	Regulation 7.25 establishes requirements for equipment with the potential to emit VOCs greater than 5 tpy not regulated elsewhere in Regulation 7.
E35	#41 Blend tank 104,520 lbs	1988	7.25	
E36	#42 Blend tank 84,500 lbs	1988	7.25	
E37	#43 Oil tank 137,125 lbs	1988	7.25	
E38	#44 Oil tank 156,400 lbs	1988	7.25	
E39	#45 Oil tank 156,400 lbs	1988	7.25	
E40	#46 Oil tank 156,400 lbs	1988	7.25	
E41	#47 Oil tank 156,400 lbs	1988	7.25	
E42	#48 Oil tank 289,320 lbs	1988	7.25	
E43	#49 Oil tank 289,320 lbs	1988	7.25	
E44	#50 Oil tank 253,680 lbs	1988	7.25	
E45	#129 Dump tank 68,500 lbs	1988	7.25	
E46	#B 15 Blend tank 110,140 lbs	1988	7.25	
E47	Slurry tank 5,000 lbs	1988	7.25	
E48	Condensate tank 9,000 lbs	1988	7.25	
Deodorizing Process				
E49	One (1) Deodorizing system	1988	7.25	Regulation 7.25 establishes requirements for equipment with the potential to emit VOCs greater than 5 tpy not regulated elsewhere in Regulation 7.
E50	Bayonne Unit	1988	7.25	



<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Basis for Applicability</b>
E52	#21 Inside Storage Room Tank 64,500 lbs	1988	7.12	Regulation 7.12 applies to each storage vessel constructed after April 19, 1972, having a storage capacity greater than 250 gallons and storing a true vapor pressure of VOC greater than 1.5 psia.
E53	#22 Inside Storage Room tank 64,500 lbs	1988	7.12	
E54	#23 Inside Storage Room tank 64,300 lbs	1988	7.12	
E55	#24 Inside Storage Room tank 64,000 lbs	1988	7.12	
E56	#25 Inside Storage Room tank 64,500 lbs	1988	7.12	
E57	#26 Inside Storage Room tank 65,000 lbs	1988	7.12	
E58	#27 Inside Storage Room tank 64,700 lbs	1988	7.12	
E59	#28 Inside Storage Room tank 115,000 lbs	1988	7.12	
E60	#70 Distillate tank 67,780 lbs	1988	7.12	Regulation 7.25 establishes requirements for equipment with the potential to emit VOCs greater than 5 tpy not regulated elsewhere in Regulation 7.
E61	#71 Shell drain tank 30,744 lbs	1988	7.25	
E62	#114 Outside Storage Area tank 204,950 lbs	1988	7.12	Regulation 7.12 applies to each storage vessel constructed after April 19, 1972, having a storage capacity greater than 250 gallons and storing a true vapor pressure of VOC greater than 1.5 psia.
E63	#115 Outside Storage Area tank 204,950 lbs	1988	7.12	
E64	#116 Outside Storage Area tank 204,950 lbs	1988	7.12	
E65	#117 Outside Storage Area tank 153,700 lbs	1988	7.12	
E66	#118 Outside Storage Area tank 86,300 lbs	1988	7.12	
E67	#119 Outside Storage Area tank 86,300 lbs	1988	7.12	

<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Basis for Applicability</b>
E68	#120 Outside Storage Area tank 86,300 lbs	1988	7.12	Regulation 7.12 applies to each storage vessel constructed after April 19, 1972, having a storage capacity greater than 250 gallons and storing a true vapor pressure of VOC greater than 1.5 psia.
E69	#121 Outside Storage Area tank 68,500 lbs	1988	7.12	
E70	#122 Outside Storage Area tank 43,354 lbs	1988	7.12	
E71	#123 Outside Storage Area tank 43,354 lbs	1988	7.12	
E72	#124 Outside Storage Area tank 98,002 lbs	1988	7.12	
E73	#126 Fat Removal Storage 94,005 lbs	1988	7.25	Regulation 7.25 establishes requirements for equipment with the potential to emit VOCs greater than 5 tpy not regulated elsewhere in Regulation 7.
E74	#161 Fat Removal Storage 95,009 lbs	1988	7.25	
E75	#201 Outside Storage Area tank 841,680 lbs	1988	7.12	Regulation 7.12 applies to each storage vessel constructed after April 19, 1972, having a storage capacity greater than 250 gallons and storing a true vapor pressure of VOC greater than 1.5 psia.
E76	#217 Outside Storage Area tank 109,000 lbs	1988	7.12	
E77	#218 Outside Storage Area tank 109,000 lbs	1988	7.12	
E78	#219 Inside Storage Area tank 81,980 lbs	1988	7.12	
E79	#220 Inside Storage Area tank 81,980 lbs	1988	7.12	
E80	#221 Outside Storage Area tank 99,000 lbs	1988	7.12	
E81	#404 Deodorizer Oil Storage 100,000 lbs	1988	7.12	
E82	#405 Deodorizer Oil Storage 45,000 lbs	1988	7.12	
E83	#406 Deodorizer Oil Storage 45,000 lbs	1988	7.12	

Emission Point	Description	Install Date	Applicable Regulations	Basis for Applicability
E84	K1 Bayonne Unit	1988	7.25	Regulation 7.25 establishes requirements for equipment with the potential to emit VOCs greater than 5 tpy not regulated elsewhere in Regulation 7.
E85	K2 Bayonne Unit	1988	7.25	
E86	K3 Bayonne Unit	1988	7.25	
E87	D/A Bayonne Unit	1988	7.25	
E88	K1 Bayonne Unit	1988	7.25	
E89	One (1) Caustic Mix Tank	1988	7.25	
E102	#145 Crude oil storage tank 2,300,000 lbs (E102)	1988	7.12	Regulation 7.12 applies to each storage vessel constructed after April 19, 1972, having a storage capacity greater than 250 gallons and storing a true vapor pressure of VOC greater than 1.5 psia.
E103	#146 Crude oil storage tank 1,185,600 lbs (E103)	1988	7.12	
E104	#147 Crude oil storage tank 3,765,000 lbs (E104)	1988	7.12	
E105	#148 Crude oil storage tank 2,300,000 lbs (E105)	1988	7.12	
E107	#30 Refining soap stock hold tank 63,800 lbs (E107)	1988	7.12	
E111	#34 Refining bleach tank 63,800 lbs	1988	7.25	Regulation 7.25 establishes requirements for equipment with the potential to emit VOCs greater than 5 tpy not regulated elsewhere in Regulation 7.
E123a	Two (2) Feed Tanks, make Alfa Laval, capacity 24000 lb/hr each.	2018	7.25	
E123b				
E124	One (1) Deo Off-Spec Tank (Feed Tank), make Alfa Laval, rated capacity 24000 lb/hr.	2018	7.25	
E125	One (1) Deodorizer, make Alfa Laval, rated capacity 400 ton/day and three (3) vacuum pumps, make Alfa Laval, rated capacity 122.7 GPM each.	2018	7.25	

Emission Point	Description	Install Date	Applicable Regulations	Basis for Applicability
<b>Refining Process</b>				
E91a	Six (6) oil mixers	1988	7.25	Regulation 7.25 establishes requirements for equipment with the potential to emit VOCs greater than 5 tpy not regulated elsewhere in Regulation 7.
E91b		1988	7.25	
E91c		1988	7.25	
E91d		1988	7.25	
E91e		1988	7.25	
E91f		1988	7.25	
E92a	Six (6) SRG-214 refining centrifuges	1988	7.25	
E92b		1988	7.25	
E92c		1988	7.25	
E92d		1988	7.25	
E92e		1988	7.25	
E92f		1988	7.25	
E93a	Two (2) water wash POD horizontal centrifuges	1988	7.25	
E93b		1988	7.25	
E95	Heaters	1988	7.25	
E96	Coolers	1988	7.25	
E97	One (1) condensate tank	1988	7.25	
E98	One (1) vacuum dryer	1986	7.25	
E99	Vacuum Pump	1988	7.25	
E100	One (1) hot well tank	1988	7.25	
E101	One (1) split box	1988	7.25	
E106	#29 Refining Wash Water Tank 40,000 lbs	1988	7.25	
E108	#31 Refining surge tank 63,800 lbs	1988	7.25	
E109	#32 Refining holding tank 64,300 lbs	1988	7.25	
E110	#33 Refining holding tank 63,800 lbs	1988	7.25	
E112	#35 Refining Tank, not in use	1988	7.25	
E116a	Two (2) Rail car wash tanks, 2,000 gallons each	1988	7.25	
E116b		1988	7.25	
E118	Acidulation Tank	1988	7.25	

ii. **Standards/Operating Limits**

1) **VOC**

Regulation 7.25 establishes requirements for equipment with the potential to emit VOCs greater than 5 tpy not regulated elsewhere in Regulation 7.

c. **Emission Unit U2 – Indirect Heat Exchangers**

i. **Equipment:**

<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Basis for Applicability</b>
E119	One (1) Dowtherm/oil heater, capacity: 3 MMBtu/hr. Fuel: natural gas	1988	7.06	Regulation 7.06, section 4 establishes requirements for indirect heat exchangers having an input capacity of more than one million BTU per hour.
E120	One (1) Dowtherm/oil heater, capacity: 4 MMBtu/hr. Fuel: natural gas	1988	7.06	
E121	One (1) Babcox and Wilcox Steam Boiler, type: watertube boiler with low NOx burner, installed originally in 1996, replaced in 2000 using same burner, capacity 43 MMBtu/hr. Fuels: natural gas	1994	7.06, and 40 CFR 60 Subpart Dc	Regulation 7.06, section 4 establishes requirements for indirect heat exchangers having an input capacity of more than one million BTU per hour.
E122	One (1) Nebraska Steam Boiler, type: watertube boiler, capacity: 60 MMBtu/hr. Fuels: natural gas with No. 2 fuel oil backup	1990		40 CFR 60 Subpart Dc establishes requirements for steam generating units greater than 10 MMBtu/hr, but less than or equal to 100 MMBtu/hr constructed after June 9, 1989.
E126	One (1) HP natural gas boiler, make Alfa Laval, rated capacity 900 kW (3.07 MMBtu/hr), installed 2018 (I.A.)	2018	7.06	Regulation 7.06, section 4 establishes requirements for indirect heat exchangers having an input capacity of more than one million BTU per hour.

**ii. Standards/Operating Limits****1) HAP**

- (a) The restriction to combust to combust liquid fuel during period of gas curtailment, gas supply emergencies, or periodic testing; ensures that E122 meets the definition of gas-fired boiler in 40 CFR 63 Subpart JJJJJ.
- (b) The restriction to not exceed a combined total of more than 48 hours of operation during a calendar year of liquid fuel testing, ensures that E122 meets the definition of gas-fired boiler in 40 CFR 63 Subpart JJJJJ

**2) Opacity**

- (a) Regulation 7.06, section 4 establishes opacity requirements for indirect heat exchangers having an input capacity of more than one million BTU per hour.
- (b) 40 CFR 60 Subpart Dc establishes an opacity standard for E122.

**3) PM**

Regulation 7.06, section 4 establishes PM requirements for indirect heat exchangers having an input capacity of more than one million BTU per hour.

**4) SO<sub>2</sub>**

- (a) Regulation 7.06, section 5 establishes SO<sub>2</sub> requirements for indirect heat exchangers having an input capacity of more than one million BTU per hour.
- (b) 40 CFR 60 Subpart Dc establishes requirements for steam generating units greater than 10 MMBtu/hr, but less than or equal to 100 MMBtu/hr constructed after June 9, 1989.

**iii. Monitoring and Recordkeeping****1) SO<sub>2</sub>**

- (a) 40 CFR 60.48c(g) establishes recordkeeping requirements for steam generating units greater than 10 MMBtu/hr, but less than or equal to 100 MMBtu/hr constructed after June 9, 1989.
- (b) 40 CFR 60.48c(e)(11) establishes the fuel supplier

certification record keeping requirement.

d. **Emission Unit UIA – Insignificant Activities**

i. **Equipment:**

Emission Point	Description	Install Date	Applicable Regulations	Basis for Applicability
CT-1	Cooling Tower for packaging line #1 (900 gal/minute)	1988	7.08	Regulation 7.08 establishes requirements for each process operation constructed after 9/1/1976.
CT-2	Cooling Tower for packaging line #2 (900 gal/minute)	1988	7.08	
CT-3	Cooling Tower for packaging line #3 (900 gal/minute)	1988	7.08	
IA TK-W100	Wastewater Receiving Tank	1988	7.25	Regulation 7.25 establishes requirements for equipment with the potential to emit VOCs greater than 5 tpy not regulated elsewhere in Regulation 7.

III. **Other Requirements**

- 1. Temporary Sources:** The source did not request to operate any temporary facilities.
- 2. Short Term Activities:** The source did not report any short term activities.
- 3. Emissions Trading:** N/A
- 4. Alternative Operating Scenarios:** The source did not request any alternative operating scenarios.
- 5. Compliance History:**

Incid. #	Date	Regulation Violated	Settlement
880024	3/23/88	Regulation 1.14, Control of Fugitive Particulate Emissions	Board Order
880039	4/13/88	Regulation 1.14, Control of Fugitive Particulate Emissions	Board Order

<b>Incid. #</b>	<b>Date</b>	<b>Regulation Violated</b>	<b>Settlement</b>
880040	4/14/88	Regulation 6.07, Standards of Performance for Existing Indirect Heat Exchangers	Board Order
880041	4/15/88	Regulation 6.07, Standards of Performance for Existing Indirect Heat Exchangers	Board Order
900102	8/2/90	Regulation 5.13, Additional Control Standards for Asbestos Removal	Agreement with fine
920067	4/2/92	Regulation 1.13, Control of Objectionable Odors	
00595	9/29/93	Regulation 1.13, Control of Objectionable Odors	
01019	12/20/94	Regulation 1.13, Control of Objectionable Odors	
01024	2/2/95	Regulation 1.13, Control of Objectionable Odors	
02357	10/31/00	Regulation 1.13, Control of Objectionable Odors	

#### 6. Calculation Methodology or Other Approved Method:

The source uses a mass balance approach to calculate hexane emissions from process emissions from the plant. Equations from AP-42, Chapter 7 are approved for calculating emissions from storage tanks. Emission factors from AP-42, Chapters 1.3 and 1.4 are approved for calculating emissions from combustion. Emission factors from AP-42, Chapter 13.4 are approved for calculating emissions from cooling towers.

#### 7. Insignificant Activities

<b>Equipment</b>	<b>Qty.</b>	<b>PTE (tpy)</b>	<b>Regulation Basis</b>
Oil/Water Separator for Packaging Line	1	0.015 VOC	Regulation 1.02, section 1.38.1.2
Brazing, soldering, welding	1	0.13 tpy PM	Regulation 1.02, Appendix A, section 3.4
Laboratory ventilating and exhausting systems which are not used for radioactive air contaminants	2	0.01 tpy VOC	Regulation 1.02, Appendix A, section 3.11



- 1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
- 3) The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15<sup>th</sup>.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
- 6) The District has determined that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.